UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

)
In re:) Chapter 9
)
CITY OF DETROIT, MICHIGAN,) Case No. 13-53846
Debtor.) Hon. Steven W. Rhodes
)

CERTIFICATE OF SERVICE

The undersigned certifies that on May 27, 2014, the American Federation of State, County and Municipal Employees Local 3308 and Local 917's CREDITORS THE AMERICAN FEDERATION OF STATE COUNTY AND MUNICIPAL EMPLOYEES LOCAL 3308 AND LOCAL 917'S MEMORANDUM IDENTIFYING ISSUES OF LAW THAT MAY BE ADJUDICATED WITHOUT THE NECESSITY OF PROOF AT THE CONFIRMATION HEARING was electronically filed with the Clerk of the Court for the United States Bankruptcy Court, Eastern District of Michigan, Southern Division using the CM/ECF System, which will send notification of such filing to all attorneys and parties of record registered electronically.

Respectfully submitted,

MILLER COHEN, P.L.C.

By:/s/ Robert D. Fetter Robert D. Fetter (P68816) Attorney for Defendant AFSCME 25 600 W. Lafayette Blvd., 4th Floor Detroit, Michigan 48226 (313) 964-4454

Dated: May 27, 2014